

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

MARY LALIBERTE, *et al.*, §  
Plaintiffs, §  
v. § Case No: 4:22-cv-03290  
QUANTA SERVICES, INC., *et al.*, §  
Defendants. §

**JOINT MOTION FOR ENTRY OF [PROPOSED] AMENDED SCHEDULING ORDER**

Plaintiffs, Mary Laliberte and Marie McKnight (collectively, “Plaintiffs”), individually and on behalf of the Quanta Services, Inc. 401(k) Savings Plan (“Plan”) and a proposed class of participants and beneficiaries in the Plan, and Defendants Quanta Services, Inc., the Board of Trustees of Quanta Services, Inc., and the Quanta Services, Inc. 401(k) Savings Plan Committee (collectively, “Defendants”), by and through their respective counsel, respectfully request the entry of the [Proposed] Amended Scheduling Order filed simultaneously with this Joint Motion.

As grounds for this Motion, the Parties aver as follows:

1. Plaintiffs filed their Complaint on September 26, 2022. Dkt. 1.
2. Defendants initially moved to dismiss under Rule 12(b)(6) on December 13, 2022, re-filing their motion on December 30, 2022. Dkt. 32, 36. Plaintiffs filed their opposition on January 12, 2023, Dkt. 40, and Defendants filed their reply on January 31, 2023. Dkt. 42.
3. On February 10, 2023, the Court entered the current scheduling order as outlined below. Dkt. 44. During the Parties’ initial status conference with the Court on February 10, 2023, the Court directed the Parties to notify it should the need for additional time arise.
4. On September 29, 2023, the Court denied the motion to dismiss in its entirety. *See* Dkt. 53.

5. On October 30, 2023, Defendant filed its Motion to Certify Interlocutory Appeal Pursuant to 28 U.S.C. § 1292(b). Dkt. 58. That motion remains pending.

6. The parties have worked diligently to complete discovery to date, including the service of written discovery requests and responses and voluminous document productions pursuant to negotiated protocols for the collection, review, and production of electronically stored information. Despite their efforts, however, the parties have not yet been able to complete their document productions. The parties anticipate that document productions will be substantially complete in the coming weeks.

7. In order to facilitate a complete review of the parties' document productions, as well as depositions and any necessary third-party discovery, the parties require a short extension to complete discovery. The proposed revised schedule is as follows:

	<b>Current Deadline</b>	<b>Proposed Deadline</b>
<b>Affirmative Expert Reports</b>	May 1, 2024	August 1, 2024
<b>Responsive Expert Reports</b>	June 14, 2024	September 13, 2024
<b>Discovery Deadline</b>	August 1, 2024	November 1, 2024
<b>Dispositive and <i>Daubert</i> Motions</b>	September 20, 2024	December 20, 2024
<b>Dispositive and <i>Daubert</i> Motion Opposition Deadlines</b>		January 31, 2025
<b>Dispositive and <i>Daubert</i> Motion Reply Deadlines</b>		March 4, 2025
<b>Joint Pretrial Order (Defendants to Plaintiffs)</b>	December 13, 2024	May 2, 2025
<b>Joint Pretrial Order (Plaintiffs to the Court)</b>	December 27, 2024	May 16, 2025
<b>Docket Call</b>	January 10, 2025	May 29, 2025
<b>Trial</b>	January 13, 2025	June 2, 2025

8. No Party will be prejudiced by the grant of the Amended Scheduling Order.

9. The Parties respectfully submit that good cause exists for modification of the operative scheduling order and this request is not made for purposes of delay or any improper purpose.

For the foregoing reasons, the Parties jointly request that this Court enter the Amended Scheduling Order.

Dated: March 19, 2024

Respectfully submitted,

/s/ John S. “Jack” Edwards, Jr.

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